

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

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**SUPPLEMENTAL JOINT STATUS REPORT OF MOVANTS AMERICAN
FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO,
AMERICAN FEDERATION OF TEACHERS, AFL-CIO, INTERNATIONAL UNION,
UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA, AFL-CIO (UAW), AND SERVICE EMPLOYEES
INTERNATIONAL UNION AND RESPONDENTS FEDERAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO AND PUERTO RICO FISCAL
AGENCY AND FINANCIAL ADVISORY AUTHORITY WITH RESPECT TO THE
JOINT MOTION FOR ENTRY OF AN ORDER AUTHORIZING DISCOVERY UNDER
BANKRUPTCY RULE 2004**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States Magistrate Judge Judith Gail Dein:

Movants American Federation of State, County and Municipal Employees International Union, AFL-CIO (AFSCME), American Federation of Teachers, AFL-CIO (AFT), International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, AFL-CIO (UAW), and Service Employees International Union (SEIU), on behalf of themselves, their local affiliates in Puerto Rico and their members (collectively, the “Unions”), and the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Oversight Board as the Commonwealth’s representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”),¹ and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and together with the Oversight Board and the Commonwealth, the “Respondents”),² respectfully submit this supplemental joint status report in response (1) to the Court’s March 19, 2018 Order Related to the Unions’ Joint Motion for an Order Authorizing Discovery Under Bankruptcy Rule 2004 (the “March 19 Order”) [ECF No. 2768] and (2) to supplement the Parties’ prior joint status report filed on March 22, 2018 (the “Initial Report”) [ECF No. 2792]. The March 19 Order requests that the Parties meet and confer regarding a revised hearing date and proposed briefing schedule in connection with the Unions’ Joint Motion for an Order Authorizing Discovery Under Bankruptcy Rule 2004 (the “Motion”). Subsequent to entry of the March 19 Order, the Parties: (1) met and conferred; (2) agreed upon a hearing date of April 19, 2018; and (3) filed the Initial Report.

Pursuant to the March 19 Order and as set forth in the Initial Report, the Parties hereby supplement the Initial Report as follows:

¹ PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

² The Movants and Respondents are collectively referred to as the “Parties.”

1. Hearing Date – The Parties are meeting and conferring in regard to the Motion and request a thirty-day adjournment of the April 19, 2018 hearing on the Motion.
2. Meet and Confer – As noted in the Initial Report, the Parties were to meet on Friday, March 23, 2018 in Puerto Rico to discuss certain items of concern to the Unions. The Parties did meet on Friday, March 23, 2018 and the Parties are continuing their discussions in regard to the Motion.
3. Briefing Schedule – In the event the Parties cannot resolve or come to an agreement in regard to the Motion, the Parties shall further supplement this status report by no later than April 13, 2018. The further supplemental report may include a proposed briefing schedule.

Dated: March 28, 2018

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